

JOHN C. ELLIS, JR.
California State Bar No. 228083
REUBEN CAMPER CAHN
California State Bar No. 255158
FEDERAL DEFENDERS OF SAN DIEGO, INC.
225 Broadway, Suite 900
San Diego, California 92101-5030
Telephone: (619) 234-8467/Facsimile: (619) 687-2666
john_ellis@fd.org/ reuben_cahn@fd.org

Attorneys for Ms. Kissane

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(**HONORABLE LARRY A. BURNS**)

UNITED STATES OF AMERICA,

Plaintiff,

v.

NICOLE KISSANE,

Defendant.

CASE NO.: 15-CR-1928-LAB

**NOTICE OF MOTION AND
MOTION TO:**

1) SUPPRESS EVIDENCE

TO: LAURA E. DUFFY, UNITED STATES ATTORNEY, JOHN N. PARMLEY, ASSISTANT UNITED STATES ATTORNEY, AND MICHAEL F. KAPLAN, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on October 14, 2016 at 10:00 a.m., or as soon thereafter as counsel may be heard, Defendant, Nicole Kissane, through her attorneys, John C. Ellis, Jr., Reuben C. Cahn, and Federal Defenders of San Diego, Inc., will ask this court to enter an order granting the following motion.

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MOTION

Defendant, Nicole Kissane, through her attorneys, John C. Ellis, Reuben Camper Cahn, and Federal Defenders of San Diego, Inc., pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law and local rules, moves this court for an order to

(1) Suppress Evidence.

This motion is based upon the attached statement of facts and memorandum of points and authorities, and any and all other materials that may come to this Court's attention at or before the hearing on these motions.

Respectfully submitted,

Dated: September 30, 2016

s/ John C. Ellis, Jr.

JOHN C. ELLIS, JR.

Federal Defenders of San Diego, Inc.
Attorneys for Ms. Kissane

Email: john_ellis@fd.org